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December 12, 2024

BY ECF

Hon. Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street
Room 2202
New York, NY 10007

RE: *Atlantic Subsea, Inc. v. Consolidated Edison Company of New York, Inc.*, 24-cv-09142 (JMF) (SLC) – Letter motion seeking redactions to filed document - Exhibit A to complaint

Dear Judge Furman:

In accordance with [SDNY Electronic Case Filing Rules and Instructions](#) §§ 6, 21, and [Your Honor's Individual Rules and Practices in Civil Cases](#) (Nov. 2024), Section 7(A), Con Edison respectfully requests that the Court seal Exhibit A to plaintiff's complaint in the above action, so that it can be re-filed with redactions to commercially sensitive pricing, and confidential personal information.

On December 6 and 11, 2024, Con Edison sought to confer with Atlantic Subsea, requesting it to take steps to temporarily seal the exhibit and re-file it with redactions because Con Edison's pricing information is proprietary business information and confidential.¹ Additionally, there is certain personal information (phone numbers and email addresses) that is sensitive in the document. We provided a copy of the document to Atlantic Subsea with highlights where we proposed redactions. We have not received a response.

¹ Attached here as "Exhibit 1" is the email chain containing the December 6 and 11 emails.

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The proposed redactions are narrowly tailored and necessary to protect confidentiality. They concern Con Edison's business pricing and its employees' personal contact information, which are "cautious" categories of information that the parties do not need Court approval to redact. ([Jesse M. Furman Individual Rules and Practices in Civil Cases](#) (Nov. 2024, Section 7(A).)

In accordance with Your Honor's Individual Rules and Practices, the document attached here as "Exhibit 2" has the proposed redactions, which are highlighted. Con Edison is filing Exhibit 2 under seal, as well as the document attached as "Exhibit 3," which is the version containing the actual redactions.

Con Edison thanks the Court for its consideration.

Very truly yours,

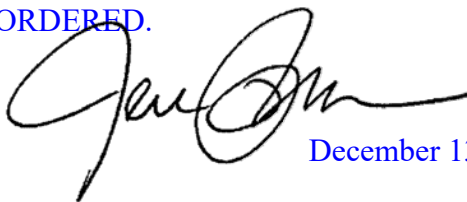
/s/ *Carlotta Cassidy*

Carlotta Cassidy

cc: All counsel via ECF

The Court agrees that the proposed redactions appear proper and, thus, grants the motion - subject to reconsideration in the event that Plaintiff disagrees, in which case it shall file a letter, not to exceed three pages, within three business days. The Clerk of Court is directed to convert ECF Nos. 1-2 and 8-2 to Court- and party-view only and to terminate ECF No. 8.

SO ORDERED.



December 13, 2024